

***SOUTHERN SAN JOAQUIN VALLEY WATER QUALITY COALITION***

***Kaweah River Sub-Watershed  
Kern River Sub-Watershed  
Kings River Sub-Watershed  
Tule River Sub-Watershed  
4886 E. Jensen Avenue  
Fresno, California 93725  
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June 26, 2007

**VIA ELECTRONIC MAIL**

Margie Lopez-Read  
**CALIFORNIA REGIONAL WATER QUALITY  
CONTROL BOARD, CENTRAL VALLEY**  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

**RE: SOUTH SAN JOAQUIN VALLEY WATER QUALITY COALITION RESPONSES TO  
ZONE 4 MONITORING DATA REPORT**

Dear Margie:

1. It is difficult for us to review and comment on data which had been accumulated from UC, Regional Board and SWAMP monitoring. The Coalition data was collected as a result of agreed upon MRP protocols, from monitoring stations agreed to by each the coalitions and Regional Board, and which was collected on uniform schedules. None of these scientific disciplines are true of the other data collections which did not have such agreed to and vetted protocols or monitoring station selections. Some of that data was from locations influenced by other sources, was taken at different frequencies and otherwise is not of the quality as Coalition derived data.

2. We concur that our Tulare Lake Basin hydrology is significantly different than the balance of the Region and our data is to be compared only to our Tulare Lake Basin, Basin Plan. We do not have the 303d, TMDL, Delta, fish, drinking water, etc. issues in our Region as are associated with the other sub-basins.

3. The criticism as to the "scarcity of monitoring data" from our sub-basin is a value judgment and not a report of monitoring data. The lower San Joaquin Valley is uniquely dry, flat, not characterized by water drainage systems, has limited run-off and what drainage there is goes into farming enterprises in the historic lake bed, and is consumed through evapotranspiration. The Regional Board approved the quantity, location and frequency of the monitoring stations and monitoring protocol. If there is a

lack of water the San Joaquin Valley itself cannot be blamed any more than the Regional Board which approved the MRPs and sites can be blamed.

4. The report overly focuses on pesticides and the extent of agriculture's reliance on them for pest damage prevention. There are many factors which may lead to water contamination – pesticides are but one. As indicated below, our pesticide monitoring does not bear out significant toxicity in our zone. The South San Joaquin Coalition data shows no pesticide or nutrient exceedance.

5. Table Z4-3 makes a point of “mortality in multiple species,” however, in each instance algae toxicity is one such species. As the Regional Board staff recognizes through its joint coordination with the South San Joaquin Coalition specific testing was engaged in source water which confirmed that algae toxicity is not as a result of agriculture run-of. Consequently, a combining of these data may have no basis.

6. The Flathead Minnow Chart (Z4-4) does not identify the monitoring site for some of the coalition reports nor does it identify the year. It shows only two identified Coalition sites (Kings Lemoore and Tule North Fork) where two samples had a 20-50% minnow mortality, thus not triggering any TIE follow-up, therefore no cause conclusions can be made. The observation is made because there is more minnow than Ceriodaphnia toxicity it could be a result of ammonia. This appears to be speculation particularly in light of the absence of high levels of nitrogen in the nutrient data.

7. Only two South San Joaquin Coalition sites demonstrated Ceriodaphnia dubia toxicity (Kings Manning and Stone Corral) and there was no TIE analysis. We found the reference to TIEs from other programs to be of interest and we will refer to that in future data analysis, however, our pesticide monitoring did not find these chemistries.

8. In the other zone reports there were separate sections regarding pesticides. This was not the case regarding our zone. There were no pesticide exceedances found in our zone and this should have been equally presented.

We join many of the comments made by the other zones, including the point that the report seems to focus on critical data rather than being truly objective. Data of a non-exceedance is equally scientific and important as that of an exceedance. The report should also guard against reference to “detections” and stay focused only on the “exceedance” threshold. Another term of a “detection” is “lawful discharge.”

9. The last sentence demanding “more frequent and comprehensive monitoring,” is not a data report but a subjective opinion as to what may occur in future discussions between the Board staff and the Coalitions and amendments to the existing waiver, Regional MRP, and Coalition MRP.

10. The summary section is not a data analysis, is disjointed, has no flow, and appears to be a collection of various staff speculations. The summary should merely be a data summary, if necessary whatsoever.

Respectfully submitted,

**/s/ William J. Thomas**

WILLIAM J. THOMAS

On behalf of the

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